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August 24, 2022

**VIA Electronic Mail**

Johner T. Wilson III, Esq.  
Dinsmore & Shohl LLP  
227 W. Monroe Street, Suite 3850  
Chicago, IL 60606

Re: *Debora Bayne, et al. v. NAPW, Inc., et al.*  
18-CV-3591 (MKB)(RER)

Dear Mr. Wilson

This firm represents Named Plaintiff Deborah Bayne (“Named Plaintiff”), FLSA Opt-in Plaintiffs, and members of the Rule 23 Class (collectively “Plaintiffs”) in the above referenced wage and hour litigation. Enclosed please find Plaintiffs’ motion for partial summary judgment pursuant to Fed. R. Civ. P. 56, including:

- 1) Notice of Plaintiffs’ Motion for Partial Summary Judgment;
- 2) Declaration of Jack L. Newhouse with Exhibits A – LL annexed thereto;
- 3) Plaintiffs’ R. 56.1 Statement of Material Facts;
- 4) Memorandum of Law in Support of Plaintiffs’ Motion for Partial Summary Judgment;  
and
- 5) Certificate of Service.

Plaintiffs will file these motion papers in accordance with the Court Ordered briefing schedule and the Judge’s individual rules.

Thank you,

/s/ Michele A. Moreno, Esq.